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*Co-Counsel to the Ad Hoc Committee of  
Governmental and Other Contingent  
Litigation Claimants*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re	: Chapter 11
	:
PURDUE PHARMA L.P., <i>et al.</i> ,	: Case No. 19-23649 (RDD)
	:
Debtors <sup>1</sup> .	: (Jointly Administered)
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**EIGHTEENTH MONTHLY FEE STATEMENT OF OTTERBOURG P.C. FOR  
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL OF THE AD HOC  
COMMITTEE'S PROFESSIONALS FOR THE PERIOD OF  
MARCH 1, 2021 THROUGH AND INCLUDING MARCH 31, 2021**

Name of Applicant:	Otterbourg P.C.
Applicant's Role in Case:	Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:	December 2, 2019, [dkt. no. 553]

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Period for Which Compensation is Sought:	March 1, 2021 – March 31, 2021
Total Amount of Fees Incurred:	\$148,287.50
Total Fees Requested (80%):	\$118,630.00
Total Reimbursement of Expenses Incurred:	\$870.21
Total Reimbursement of Expenses Requested (100%):	\$870.21
Total compensation and Reimbursement Requested in this Statement:	\$119,500.21
This is Applicant's:	Eighteenth Monthly Fee Statement

Pursuant to the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee's Professionals*, dated December 2, 2019 [Dkt. No. 553] (the "Fee Assumption Order"), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals*, dated November 21, 2019 [Dkt. No. 529] (the "Interim Compensation Order"), Otterbourg P.C. (the "Applicant"), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants in the above-captioned case, hereby submits this Eighteenth Monthly Fee Statement (the "Fee Statement") for the period of March 1, 2021 – March 31, 2021 (the "Statement Period").

**Itemization of Services Rendered and Disbursements Incurred**

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Statement Period with respect to each of the project categories. As reflected in Exhibit A, Applicant incurred \$148,287.50 in fees during the Statement Period. Pursuant to this Fee Statement, Applicant seeks reimbursement for 80% of such fees, totaling \$118,630.00.

2. Annexed hereto as **Exhibit B** is a chart of Applicant's professionals and paraprofessionals, including the standard hourly rate for each attorney and paraprofessional who rendered services to the Debtors in connection with these chapter 11 cases during the Statement Period and the title, hourly rate, aggregate hours worked and the amount of fees earned by each professional. The blended hourly billing rate of attorneys for all services provided during the Statement Period is \$1,190.96<sup>2</sup>. The Blended hourly rate of all paraprofessionals is \$325.00<sup>3</sup>. A copy of the computer-generated time entries reflecting the time recorded, organized in project billing categories by Applicant is attached hereto as **Exhibit C**.

3. Annexed hereto as **Exhibit D** is a chart of necessary and out-of-pocket expenses incurred by the Applicant in the amount of \$870.21 in connection with providing professional services during the Statement Period. A copy of the computer-generated list of expenses is attached hereto as **Exhibit E**.

4. Applicant, to the best of its knowledge, has not included any fees in connection with or relating to the allocation of value among the Debtors' creditors.

### **Notice**

5. Applicant will provide notice of this Fee Statement in accordance with the Interim Compensation Order.

WHEREFORE, Applicant, in connection with services rendered as co-counsel to the ad hoc committee of governmental and other contingent litigation claimants, respectfully requests (i) compensation in the amount of \$118,630.00, which is equal to 80% of the total amount of reasonable compensation for actual, necessary legal services that Applicant incurred in

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<sup>2</sup> The blended hourly billing rate of \$1,190.96 is derived by dividing the total fees for attorneys of \$144,582.50 by the total hours of 121.4.

<sup>3</sup> The Blended hourly billing rate of \$325.00 for paraprofessionals is similarly derived by dividing the total fees for paraprofessionals of \$3,705.00 by the total hours of 11.4.

connection with such services during the Statement Period (*i.e.*, \$148,287.50) and (ii) payment of \$870.21 for the actual, necessary expenses that Applicant incurred in connection with such services during the Statement Period.

Dated: July 15, 2021  
New York, New York

OTTERBOURG P.C.

By: /s/ Melanie L. Cyganowski  
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Jennifer S. Feeney, Esq.  
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**EXHIBIT A**

**Fees By Project Category**

**SUMMARY OF COMPENSATION BY PROJECT CODE  
FOR THE STATEMENT PERIOD**

<b>Project Code</b>	<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
PU01	Asset Analysis and Recovery	1.0	\$1,400.00
PU04	Case Administration	.3	\$420.00
PU06	Employment and Fee Applications	21.8	\$11,784.00
PU08	Litigation: Contested Matters, Adversary	4.3	\$4,151.50
PU09	Meetings and Communications w/ AHC	14.9	\$17,427.50
PU11	Plan & Disclosure Statement	90.5	\$113,104.50
	<b>TOTALS:</b>	<b>132.8</b>	<b>\$148,287.50</b>

**EXHIBIT B**

**Professional and Paraprofessional Fees**

**SUMMARY OF HOURS BILLED BY PROFESSIONALS AND PARAPROFESSIONALS  
FOR THE STATEMENT PERIOD**

<b>Professional</b>	<b>Year Admitted</b>	<b>Rate Per Hour</b>	<b>No. of Hrs.</b>	<b>Total Compensation</b>
Melanie L. Cyganowski ("MLC") Partner	1982	\$1400.00	77.9	\$109,060.00
Jennifer S. Feeney ("JSF") Of Counsel	1998	\$895.00	28.0	\$25,060.00
Robert C. Yan ("RCY") Associate	2002	\$675.00	15.5	\$10,462.50
Jessica K. Hildebrandt ("JKH") Paralegal	N/A	\$325.00	11.4	\$3,705.00
	<b>TOTAL</b>		<b>132.8</b>	<b>\$148,287.50</b>

**EXHIBIT C**

**Time Detail**

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter No.: 20186/0002  
Matter Name: CHAPTER 11  
Billing Partner: RL STEHL

July 14, 2021  
BILL NO. 217689

For Services Rendered Through March 31, 2021:

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Phase: PU01	ASSET ANALYSIS AND RECOVERY
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/17/21 MLC	Examine Documents Review of media motion to unseal certain Sackler documents and Sackler parties' response	1.00	1,400.00
TOTAL PHASE PU01		1.00	\$1,400.00

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Phase: PU04	CASE ADMINISTRATION
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/16/21 MLC	Correspondence Correspondence among Otterbourg team re filing of interim fee application	.30	420.00
TOTAL PHASE PU04		.30	\$420.00

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Phase: PU06	EMPLOYMENT & FEE APPLICATIONS
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/01/21 RCY	Examine Documents Examine time detail for October through December monthly statement preparation and fee application.	1.20	810.00
03/01/21 JKH	Prepare Papers Prepare fee application	.60	195.00
03/02/21 RCY	Examine Documents Review time detail in preparation of October through December 2020 monthly statements.	2.10	1,417.50
03/02/21 JKH	Prepare Papers Prepare draft monthly statements	.60	195.00
03/04/21 RCY	Examine Documents Provide comments on October through December monthly statements for finalization.	.80	540.00
03/04/21 JKH	Prepare Papers Prepare monthly fee statements for Oct. Nov. and Dec.	1.30	422.50
03/11/21 JKH	Prepare Chart(s) Prepare exhibits for fee application	.60	195.00
03/12/21 MLC	Draft/revise Final review of Otterbourg's fee application	1.00	1,400.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/12/21 RCY	Examine Documents Review and Finalize Fee Application and monthly statements for Filing	2.30	1,552.50
03/12/21 JKH	Prepare Papers Prepare interim fee application	3.20	1,040.00
03/15/21 JKH	Prepare Papers Revise monthly statements for Oct - Dec	.30	97.50
03/15/21 JKH	Prepare Legal Papers Edit interim fee application	.30	97.50
03/16/21 JSF	Examine Documents Review of Interim Fee Application	1.20	1,074.00
03/16/21 RCY	Examine Documents Confer with JKH re: revisions to fee application	1.30	877.50
03/16/21 RCY	Examine Documents Provide comments to fee application to finalize.	.70	472.50
03/16/21 JKH	Telephone Call(s) Telephone call with RCY to discuss changes and edits to fee application	1.30	422.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/16/21 JKH	Prepare Papers Edit fee application and finalize for filing	2.30	747.50
03/17/21 JKH	Prepare Legal Papers Prepare monthly statements for filing	.20	65.00
03/17/21 JKH	Prepare Legal Papers Prepare fee application for filing	.30	97.50
03/24/21 JKH	Diary & Docket Review notice of hearing and calendar objection deadline re: fee application	.20	65.00
TOTAL PHASE PU06		21.80	\$11,784.00

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Phase: PU08	LITIGATION: CONTESTED MATTERS, ADVERSARY
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/13/21 MLC	Analysis of Memorandum Review of debtors' motion to extend time for preliminary injunction	.60	840.00
03/19/21 JSF	Examine Documents Review of NCSG Objection to Continuation of Preliminary Injunction Against Sacklers	.40	358.00

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230 PARK AVENUE  
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/23/21 JSF	Examine Documents Review of NCSG Objection to Extension of Injunction	.30	268.50
03/23/21 JSF	Examine Documents Review of UCC Statement in Support of Continuation of Injunction	.20	179.00
03/23/21 JSF	Examine Documents Review of AHC Statement in Support of Continuation of Injunction	.20	179.00
03/23/21 JSF	Examine Documents Review of Debtors' Response to Objections to Motion for Continuation of Injunction	.40	358.00
03/24/21 JSF	Telephone Call(s) Participate in Court Hearing re: Extension of Preliminary Injunction	2.20	1,969.00
TOTAL PHASE PU08		4.30	\$4,151.50

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Phase: PU09	MEETINGS & COMMUNICATIONS W/ AD HOC
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/03/21 MLC	Conference call(s) Conference call weekly meeting with AHC	1.70	2,380.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/03/21 RCY	Telephone Call(s) Participate in weekly call with AHC.	1.60	1,080.00
03/09/21 MLC	Conference call(s) Biweekly call with mediation subgroup re plan amendments	.60	840.00
03/10/21 JSF	Telephone Call(s) Participate in Weekly Update Call with AHC	1.00	895.00
03/10/21 MLC	Conference call(s) Participated in weekly update call with AHC	1.00	1,400.00
03/10/21 MLC	Correspondence Correspondence among AHC counsel in preparation for AHC meeting	.30	420.00
03/15/21 MLC	Conference call(s) Conference call with AHC re status of plan negotiations with various parties	1.00	1,400.00
03/15/21 MLC	Conference call(s) Follow up conference call with AHC re continuing negotiations with various third parties	1.00	1,400.00
03/17/21 JSF	Telephone Call(s) Participate in Weekly Update Call with Full AHC and Professionals	1.30	1,163.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/17/21 JSF	Examine Documents Prepare for AHC Call - Updates to Committe	.30	268.50
03/17/21 MLC	Prepare for Meeting Prepared for weekly meeting with AHC	.80	1,120.00
03/17/21 MLC	Conference call(s) Weekly meeting with AHC	1.40	1,960.00
03/24/21 JSF	Telephone Call(s) Participate in Weekly AHC Call with Professionals and Committee	.90	805.50
03/31/21 JSF	Telephone Call(s) Participate in Weekly Meeting of AHC	1.00	895.00
03/31/21 MLC	Conference call(s) Weekly conference call with AHC and counsel	1.00	1,400.00
TOTAL PHASE PU09		14.90	\$17,427.50

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Phase: PU11 PLAN & DISCLOSURE STATEMENT

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/01/21 MLC	Court Appearance - General Attended hearing on motion to extend exclusivity and injunction	.80	1,120.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/01/21 MLC	Analysis of Memorandum Reviewed and analyzed memorandum re post-emergence issues	1.10	1,540.00
03/01/21 MLC	Correspondence Correspondence with DOJ and UCC re scheduling of meetings to coordinate plan provision review	.30	420.00
03/01/21 MLC	Correspondence Correspondence with certain AHC members re selection process of board members	.40	560.00
03/01/21 RCY	Attendance at Hearing Attend hearing on plan exclusivity.	.60	405.00
03/02/21 MLC	Conference call(s) Meeting with States subgroup with KL re open plan issues	1.50	2,100.00
03/02/21 MLC	Analysis of Memorandum Review of consultant indemnification agreement	1.20	1,680.00
03/02/21 MLC	Analysis of Memorandum Review and analysis of revised drafts of the Plan and the NewCo/TopCo Term Sheet received from the Debtors	2.10	2,940.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/03/21 MLC	Conference call(s) conference call meeting to interview two search firms re: board positions	2.00	2,800.00
03/04/21 MLC	Conference call(s) Conference call with States subgroup and KL concerning current plan provisions and next steps	1.00	1,400.00
03/04/21 MLC	Correspondence Correspondence with States subgroup concerning telcon with Debtors' counsel re plan developments	.60	840.00
03/04/21 MLC	Analysis of Memorandum Review and analysis of revised term sheet provisions as modified by AHC/States	3.10	4,340.00
03/05/21 MLC	Conference call(s) Conference call with AHC and Debtors and their counsel re open plan issues	1.40	1,960.00
03/05/21 MLC	Analysis of Memorandum Review and analysis of mark up of plan term sheet	1.60	2,240.00
03/05/21 MLC	Correspondence Correspondence between Peacock and Brown Rudnick re operations of various trusts	.70	980.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/05/21 MLC	Correspondence Correspondence with AHC subgroup re selection of firm to assist in recruiting and selecting board members	.40	560.00
03/06/21 MLC	Correspondence Correspondence with States and Gilbert firm re preparation of statement re governance structure for NCSG	.90	1,260.00
03/06/21 MLC	Analysis of Memorandum Review and analysis of updated term sheet	2.20	3,080.00
03/06/21 MLC	Correspondence correspondence among AHC counsel re latest turn of term sheet	.70	980.00
03/07/21 MLC	Analysis of Memorandum Review of mark up of term sheet and related documents	1.30	1,820.00
03/08/21 MLC	Analysis of Memorandum Reviewed term sheet revised by debtors' counsel	1.40	1,960.00
03/10/21 MLC	Analysis of Memorandum Reviewed and analyzed plan amendments	2.30	3,220.00
03/10/21 MLC	Analysis of Memorandum Reviewed amendments to plan supplements	1.70	2,380.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/10/21 MLC	Correspondence Correspondence with DPW re exchange of certain drafts with other parties	.40	560.00
03/10/21 MLC	Correspondence Correspondence among AHC subgroup to revise certain definition terms in amended TS	.60	840.00
03/10/21 RCY	Examine Documents Examine comments to latest plan draft.	.90	607.50
03/11/21 MLC	Conference call(s) Conference call with Debtors and AHC re remaining open issues re plan negotiations	1.00	1,400.00
03/11/21 MLC	Analysis of Memorandum Continued review of plan amendments	3.30	4,620.00
03/11/21 MLC	Telephone Call(s) Telcon with Ken Eckstein re status of certain outstanding issues	.70	980.00
03/11/21 RCY	Examine Documents Examine latest comments to draft plan.	.20	135.00
03/12/21 MLC	Analysis of Memorandum Reviewed and analyzed revisions to plan	2.70	3,780.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/13/21 MLC	Conference call(s) Conference call with AHC counsel re plan, remaining open issues and next steps	1.00	1,400.00
03/13/21 MLC	Correspondence Correspondence among AHC subgroup re call to discuss remaining open issues	.30	420.00
03/13/21 MLC	Correspondence Correspondence among AHC subgroup re indemnification open issues	.60	840.00
03/13/21 MLC	Analysis of Memorandum Review of debtors' revisions to Newco/Topco governance term sheet	1.10	1,540.00
03/14/21 MLC	Analysis of Memorandum Review of mark-up annotations by Kramer Levin re UCC list of remaining open plan issues	1.10	1,540.00
03/14/21 MLC	Correspondence Correspondence among AHC plan subgroup re fee issues and other open MSGE issues	.60	840.00
03/15/21 JSF	Telephone Call(s) Participate in Conference Call with Professionals and Subgroup re: Status of Plan Negotiations	1.20	1,074.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/15/21 JSF	Examine Documents Review of Updated Issues Lists and Status of Open Items for Plan Filing	2.50	2,237.50
03/15/21 MLC	Analysis of Memorandum Review and analysis of memo comparing debtors/AHC drafts of governance term sheets for Topco/NewCo	1.30	1,820.00
03/15/21 MLC	Correspondence Correspondence from J Peacock and J Rice re calls with Kesselman and Birnbaum re status of negotiations re indemnification, criminal releases and other open issues	.80	1,120.00
03/15/21 MLC	Correspondence Follow up correspondence from Peacock re calls with Kesselman and Birnbaum re support for plan	.50	700.00
03/15/21 MLC	Correspondence Correspondence among AHC counsel re need for latest Plan drafts and blackline of revisions	.60	840.00
03/15/21 MLC	Examine Documents Reviewed draft of statement to press re position re: plan	.30	420.00
03/15/21 MLC	Analysis of Memorandum Review of revised term sheet as revised by debtors	1.10	1,540.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/15/21 MLC	Correspondence Follow up correspondence with Kesselman re status of various decisions and debtors' press release	.40	560.00
03/15/21 MLC	Analysis of Memorandum Memo by Brown Rudnick re tax implications of minimum Topco distributions	.60	840.00
03/15/21 MLC	Analysis of Memorandum Review of MSGE joinder to term sheet	.30	420.00
03/15/21 MLC	Analysis of Memorandum Review of follow up comparison of latest revisions to term sheet against prior draft	.80	1,120.00
03/15/21 MLC	Correspondence Follow up correspondence re import of changes to draft term sheet	.40	560.00
03/15/21 MLC	Draft/revise Revisions to draft of debtors' term sheet following conference call meeting with AHC plan subcommittee	.80	1,120.00
03/15/21 MLC	Correspondence Follow up correspondence among AHC subcommittee and counsel re commentary on proposed revisions to plan term sheet	.50	700.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/15/21 MLC	Correspondence Correspondence among AHC counsel and AHC plan subcommittee re follow up conferences with DPW re plan revisions	.40	560.00
03/15/21 RCY	Examine Documents Examine draft of proposed plan and related documents in advance of filing.	1.20	810.00
03/16/21 JSF	Examine Documents Review of Filed Plan Materials and Unresolved Issues	1.40	1,253.00
03/16/21 MLC	Examine Documents Reviewed current draft of plan filed by debtors	1.70	2,380.00
03/16/21 MLC	Examine Documents Reviewed disclosure statement filed by debtors	1.30	1,820.00
03/16/21 MLC	Correspondence Correspondence among AHC counsel and AHC plan subcommittee re changes to debtors' plan and disclosure statement	.70	980.00
03/16/21 RCY	Examine Documents Marked comparisons of filed plan with prior iteration circulated.	.60	405.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/16/21 JKH	Review/analyze Review plan and related documents and calendar upcoming deadlines and hearings	.20	65.00
03/17/21 MLC	Correspondence Correspondence among AHC counsel and AHC plan subcommittee re resolution of certain open issues	.60	840.00
03/22/21 JSF	Telephone Call(s) Call with Eric Snyder (Counsel for AL) re: Plan Questions	.40	358.00
03/22/21 JSF	Examine Documents Review of Plan and DS	1.50	1,342.50
03/22/21 JSF	Examine Documents Review of Pension Liability Issues re: Inquiry from Alabama Counsel	.30	268.50
03/22/21 RCY	Telephone Call(s) Call with JSF and E. Snyder (Alabama) re: plan contents.	.30	202.50
03/22/21 RCY	Examine Documents Examine disclosure statement re: pension plan treatment and memo to JSF for discussion with Alabama counsel.	1.10	742.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/23/21 JSF	Telephone Call(s) Call with Eric Snyder (Counsel to AL) re: Plan Questions	.20	179.00
03/23/21 JSF	Examine Documents Review of Proposed Release Provisions in the Plan	1.30	1,163.50
03/23/21 JSF	Examine Documents Review of Comprehensive Open Issues List and Plan and DS Schedule	2.20	1,969.00
03/23/21 JSF	Examine Documents Review of Mediators' Final Report	.30	268.50
03/23/21 JSF	Examine Documents Review of Private Settlement Payout Schedule and Payments from Sacklers	.20	179.00
03/23/21 RCY	Examine Documents Examine updated issues list with respect to plan.	.30	202.50
03/23/21 RCY	Examine Documents Examine revised Sackler settlement agreement.	.30	202.50
03/29/21 JSF	Examine Documents Review of Plan Terms	1.80	1,611.00

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03/29/21 JSF	Examine Documents Review of Plan and Related Documents Open Issues	1.20	1,074.00
03/29/21 MLC	Analysis of Memorandum Reviewed draft of plan terms	2.20	3,080.00
03/29/21 MLC	Examine Documents Reviewed memorandum comparing revisions to plan terms	1.20	1,680.00
03/30/21 JSF	Examine Documents Review of Update on Status of Negotiations with MSGE	.20	179.00
03/30/21 JSF	Examine Documents Review of Filed Plan and Disclosure Statement	1.70	1,521.50
03/30/21 JSF	Examine Documents Review of Releases and Open Issues	.80	716.00
03/30/21 MLC	Correspondence Reviewed correspondence providing update re negotiations re MSGE	.30	420.00
03/30/21 MLC	Examine Documents Reviewed filed plan and DS	2.30	3,220.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/30/21 MLC	Analysis of Memorandum Reviewed memo re releases and other remaining open issues	1.10	1,540.00
03/30/21 MLC	Correspondence Review of correspondence among AHC counsel re: plan status and ongoing negotiations	2.30	3,220.00
03/31/21 JSF	Examine Documents Review of Sackler Credit Support Proposals and Open Issues re: Sackler Contribution	.60	537.00
03/31/21 JSF	Examine Documents Review of Status of Open Issues on Plan and Remaining Negotiations	.80	716.00
03/31/21 MLC	Examine Documents Reviewed Sackler credit support proposals and open issues with respect to Sackler contribution	.90	1,260.00
03/31/21 MLC	Correspondence Correspondence outlining remaining open issues and remaining negotiations	.70	980.00
TOTAL PHASE PU11		90.50	\$113,104.50
		TOTAL FOR SERVICES	\$148,287.50

**EXHIBIT D**

**Summary of Actual and Necessary Expenses**

**SUMMARY OF ACTUAL AND NECESSARY DISBURSEMENTS FOR THE  
STATEMENT PERIOD**

<b>Expense Category</b>	<b>Total Expenses</b>
Electronic Research	\$870.21
<b>TOTAL:</b>	<b>\$870.21</b>

**EXHIBIT E**

**Expense Detail**

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DISBURSEMENTS FOR YOUR ACCOUNT

Electronic Research

870.21

TOTAL DISBURSEMENTS

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870.21